

INSPECTION SUMMARY NARRATIVE

Producer Establishment

Company Name & Address: Zurn Industries, LLC
5900 Elwin Buchanan Drive
Sanford, NC 27330-9541

EPA Establishment Number: None

Product Brand Name & Reg. Number : Z5615-BWL-AM Wall-Mounted Flush Valve Bowl with Top Spud, Z5616-BWL Wall-Mounted Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5617-BWL Wall-Mounted Flush Valve Bowl with Back Spud, Z5655-BWL-BA-AM Floor-Mounted Flush Valve Bowl with Top Spud, Z5655-BWL-AM Floor-Mounted Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5657-BWL-AM Floor-Mounted Flush Valve Bowl with Back Spud, Z5654-BWL-AM Floor-Mounted, Youth Height Flush Valve Bowl with Top Spud, Z5665-BWL-BA-AM Floor-Mounted, ADA Flush Valve Bowl with Top Spud, Z5666-BWL-AM Floor-Mounted, ADA Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5635-BWL Floor-Mounted, Back Outlet Flush Valve Bowl with Top Spud, Z5636-BWL Floor-Mounted, Back Outlet, Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5637-BWL Floor-Mounted, Back Outlet Flush Valve Bowl with Back Spud, Z5645-BWL Floor-Mounted, Back Outlet, ADA Flush Valve Bowl with Top Spud, Z5646-BWL Floor-Mounted, Back Outlet, ADA Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5647-BWL Floor Mounted, Back Outlet, ADA Flush Valve Bowl with Back Spud, Z5410 Wall-Mounted Blow Out Service Sink, Z5420 Floor-Mounted Blow Out Service Sink, Z5461-AM Wall-Mounted 28" X 22" Surgeon Sink, Single Hole, and Z5468-AM Wall-Mounted 28" X 22" Surgeon Sink, 8" Center Faucet Holes; No EPA Reg. No.

Date of Inspection: March 28, 2016

Narrative:

On March 28, 2016, in response to EPA Referral Request Number 28-NC-16 (dated March 10, 2016), Inspector Steven F. Gatton and I conducted an inspection at Zurn Industries, LLC, located at 5900 Elwin Buchanan Drive in Sanford, NC. EPA Credentials were presented and a Notice of Inspection was issued to Daniel J. Danowski, Quality Manager.

Zurn Industries LLC sells EcoVantage commercial fixtures with SilverShield antimicrobial glaze. According to Mr. Danowski, the initial availability for these products was in January 2013. The SilverShield product containing Additive SSB, EPA Reg. No. 83587-3, is exported from NanoHorizons, Inc., located at 270 Rolling Ridge Drive, Suite 100 in Bellefonte, PA, to manufacturing facilities in China and Mexico. The product is added to the glaze during the manufacturing process. The fixtures containing the glaze are then shipped to Zurn Industries LLC, located at 2117 US Hwy 20 East in Abilene, TX, where they are housed prior to distribution.

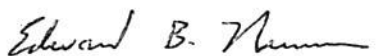
The Sanford, NC facility serves as the billing location for the company and it also assembles and tests flush valves; no products with an antimicrobial claim are produced at this facility, according to Mr. Danowski. Mr. Danowski said all invoices concerning the sale and distribution of the 19 products containing the SilverShield antimicrobial glaze along with the product labels could be accessed from the Sanford, NC location. All invoices could not be obtained at the time of the inspection.

On April 1, 2016, Inspector Gatton and I returned to Zurn Industries LLC in Sanford for invoices of the 19 products containing the SilverShield antimicrobial glaze. EPA Credentials were presented and a Notice of Inspection was issued to Mr. Danowski. Labels were obtained for some of the products; photographs of the labels were obtained for the remainder of the products. All photographs of labels had been taken at the Zurn Industries LLC Abilene, TX location. Labels and photographs of the labels for Z5615-BWL-AM Wall-Mounted Flush Valve Bowl with Top Spud, Z5616-BWL Wall-Mounted Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5617-BWL Wall-Mounted Flush Valve Bowl with Back Spud, Z5655-BWL-BA-AM Floor-Mounted Flush Valve Bowl with Top Spud, Z5655-BWL-AM Floor-Mounted Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5657-BWL-AM Floor-Mounted Flush Valve Bowl with Back Spud, Z5654-BWL-AM Floor-Mounted, Youth Height Flush Valve Bowl with Top Spud, Z5665-BWL-BA-AM Floor-Mounted, ADA Flush Valve Bowl with Top Spud, Z5666-BWL-AM Floor-Mounted, ADA Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5468-AM Wall-Mounted 28" X 22" Surgeon Sink, 8" Center Faucet Holes, Z5635-BWL Floor-Mounted, Back Outlet Flush Valve Bowl with Top Spud, Z5636-BWL Floor-Mounted, Back Outlet, Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5637-BWL Floor-Mounted, Back Outlet Flush Valve Bowl with Back Spud, Z5645-BWL Floor-Mounted, Back Outlet, ADA Flush Valve Bowl with Top Spud, Z5646-BWL Floor-Mounted, Back Outlet, ADA Flush Valve Bowl with Top Spud and Bedpan Lugs, Z5647-BWL Floor Mounted, Back Outlet, ADA Flush Valve Bowl with Back Spud, Z5410 Wall-Mounted Blow Out Service Sink, Z5420 Floor-Mounted Blow Out Service Sink, and Z5461-AM Wall-Mounted 28" X 22" Surgeon Sink, Single Hole, were obtained, along with packing slips for each of the products. These were identified "SN 040116105680101 EBN" through "SN 040116105680119 EBN" respectively. All labels and photographs of labels of each fixture contained the wording "with Anti-Microbial Coating" or "with Anti-Microbial Glaze" except for the label of Z5420 Floor Mounted Siphon Jet Service Sink.

The EPA Accepted Label, dated September 8, 2015, for Additive SSB, EPA Reg. No. 83587-3, was obtained from Mr. Danowski and identified as "SN 040116105680120 EBN". According to the EPA Accepted Label, the product is manufactured for NanoHorizons, Inc., 270 Rolling Ridge Drive, Suite 100, Bellefonte, PA 16823, with EPA Establishment No. 83587-PA-001 listed. A Product Data Sheet for SmartSilver WC-10, Product #NP10-10-WC, from NanoHorizons, Inc., was obtained and included with the accepted label and also identified "SN 040116105680120 EBN". Labeling for "Zurn EcoVantage Commercial Fixtures with SilverShield Antimicrobial Glaze" was obtained from Mr. Danowski and identified "SN 040116105680121 EBN".

A Receipt for Samples was issued to Mr. Danowski documenting the collection of labels and packing slips for each of the 19 fixtures as well as the EPA Accepted Label for Additive SSB, the Product Data Sheet for SmartSilver WC-10, and additional product labeling. A Statement, dated April 1, 2016, showing the requests for literature concerning the SilverShield product, the requests for labels and packing slips for each of the products, requests for information regarding the initial availability of the products, and the addresses for the manufacturing firms in China and Mexico that incorporate the product in the fixtures for Zurn Industries LLC, was signed by Mr. Danowski.

Name of Inspector: Edward B. Nunn

Signature of Inspector: 

Date: April 6, 2016